

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 4:19-cv-10520-DHH

CHARU DESAI,
Plaintiff,

v.

UMASS MEMORIAL MEDICAL CENTER,
INC., et al.,
Defendants.

**ASSENTED-TO MOTION FOR
LEAVE TO EXCEED PAGE LIMIT
FOR MEMORANDUM OF LAW BY
PLAINTIFF**

Plaintiff, Charu Desai, M.D., with the assent of all parties, moves for leave to exceed the page limit set forth in Local Rule 7.1 for her forthcoming memorandum of law in opposition to Defendants' motion for summary judgment, and in support thereof, states as follows:

1. As the Court is aware, pursuant to Local Rule 7.1(b)(4) of the Local Rules for the District Court for the District of Massachusetts, a memorandum supporting a motion "shall not, without leave of court, exceed 20 pages, double-spaced."

2. Because Plaintiff's claims in this action are numerous, complex and include multiple theories of recovery, and because the factual record in this action is extensive, on December 1, 2021, Defendants UMass Memorial Medical Center, Inc., UMass Memorial Medical Group, Inc., Max Rosen, M.D., Stephen Tosi, M.D. ("Defendants"), who jointly moved for summary judgment, determined that additional pages were necessary for their memorandum in support of their Motion for Summary Judgment.

3. On December 3, 2021, Defendants filed an Assented-To Motion for leave to exceed the page limit set out in Local Rule 7.1(b)(4). (Defendants requested permission to file a brief no longer than thirty pages.) On December 3, 2021, this Court granted Defendants' motion.

4. In the process of preparing her opposition to Defendants' motion for summary judgment and supporting memorandum of law, Plaintiff has determined that additional pages are necessary to adequately respond to the lengthier brief submitted by Defendants on the several claims and complex legal issues in this matter.

5. Plaintiff has conducted a good faith evaluation and has determined that thirty pages would be reasonable and sufficient for her memorandum of law in opposition to the motion.

6. Counsel for Plaintiff has conferred with counsel for Defendants, UMass Memorial Medical Center, Inc., UMass Memorial Medical Group, Inc., UMass Memorial Marlborough Hospital, Max Rosen, M.D., Stephen Tosi, M.D., and Karen Dill, M.D., and they have assented to the relief requested in this Motion.

WHEREFORE, Plaintiff, Charu Desai, M.D., respectfully request leave of court to exceed the page limit and to file a memorandum of law in support of her opposition to motion for summary judgment of up to thirty (30) pages.

Respectfully submitted,

CHARU DESAI, M.D.,

By her attorneys,

/s/ Patricia A. Washienko
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Dated: January 26, 2022

CERTIFICATE OF SERVICE

I, Patricia A. Washienko, hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this day.

/s/Patricia A. Washienko

Patricia Washienko

Dated: January 26, 2022